

South Coast Air Quality Management District

Statement of Basis

Title V Facility Permit Renewal

Issuance Date: December 30, 2012

Facility Name:	LA County Sanitation Districts (LACSD), Palos Verdes
Facility ID:	24520
SIC Code:	4953
Equipment Location:	26301 S. Crenshaw Boulevard (Palos Verdes LF) Rolling Hills Estates, CA 90274
Application #(s):	526210
Application Submittal Date(s):	08/19/2011
Permit Renewal:	Draft
Revision No. 1 Date:	May 18, 2010
Permit Section(s) Affected:	Various
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1. Introduction and Scope of Permit

Title V is a national operating permit program for air pollution sources. Facilities subject to Title V must obtain a Title V permit and comply with specific Title V procedures to modify the permit. This permit replaces the facility's other existing permits. Title V does not necessarily include any new requirements for reducing emissions. It does, however, include new permitting, noticing, recordkeeping, and reporting requirements.

The AQMD implements Title V through Regulation XXX – Title V Permits, adopted by the AQMD Governing Board in order to comply with EPA's requirement that local air permitting authorities develop a Title V program. Regulation XXX was developed with the participation of the public and affected facilities through a series of public workshops, working group meetings, public hearings and other meetings.

The Title V major source threshold for a particular pollutant depends on the attainment status of the pollutant. NO₂, SO₂, and lead are in attainment with federal standards. The status of CO is designated to attainment status. The status for PM-10 is serious nonattainment. The status for ozone is currently extreme nonattainment.

A Title V renewal permit is proposed to be issued to cover the operations of an inactive municipal solids waste landfill. This facility is subject to Title V requirements because it is a major source.

2. Facility Description

This is an inactive landfill facility. Main operations include LFG collection system, landfill condensate/leachate collection/ treatment system and LFG enclosed flare station. The facility is located at 26301 S. Crenshaw Boulevard (Palos Verdes Landfill), Rolling Hills Estates, Ca.

3. Construction and Permitting History

An initial Title V permit was issued on 1/30/2007, and is due to expire on 1/29/2012. Title V revision No. 1 was issued on May 18, 2010 that included permits to construct for LFG micro turbines (A/N 483598), LFG fuel cell (A/N 483617), LFG flare (A/N 483623) and change of equipment description for LFG collection system (A/N 483625), in Section H. In August, 2011, LACSD requested that the permits to construct for the microturbines, fuel cell, and change to the collection system be cancelled, since the equipment and changes were not going forward (LACSD was already constructing the new flare). The new flare started operation shortly thereafter, and then LACSD removed the boiler which had operated for many years despite steadily declining methane content. The proposed permit revises Section H by indicating only the new flare, and revises Section D by indicating the boiler is removed.

4. Regulatory Applicability Determinations

Applicable legal requirements for which this facility is required are identified in the Title V permit (for example, Section D, E, and H, K, of the proposed Title V renewed permit). Applicability determinations (i.e., determinations made by the District with respect to what legal requirements apply to a specific piece of equipment, process, or operation) can be found in the Engineering Evaluations. This facility is subject to NSPS and NESHAP requirements. NSPS requirements of 40 CFR Part 60 apply to certain units at the facility and the permit terms and conditions may be found in Section D of the Title V permit. NESHAP requirements of 40 CFR Part 63 applies to certain units at the facility and the permit terms and conditions may be found in Sections D and J of the Title V permit.

5. Monitoring and Operational Requirements

Applicable monitoring and operational requirements for which the facility is required to comply are identified in the Title V permit (for example, Section D, F, and J and Appendix B of the proposed Title V permit). Discussion of any applicable monitoring and operational requirements can be found in the Engineering Evaluations. Compliance Assurance Monitoring (CAM) requirements of 40 CFR Part 64 apply to the permitted emission control source at this facility. CAM plan for TNMHC emission control using APC (flares) is addressed under A/N 526306.

6. Permit Features

Permit Shield

A permit shield is an optional part of a Title V permit that gives the facility an explicit protection from requirements that do not apply to the facility. A permit shield is a provision in a permit that states that compliance with the conditions of the permit shall be deemed compliance with all

identified regulatory requirements. To incorporate a permit shield into the Title V permit involves submission of applications for change of conditions for each equipment affected by the permit shield. Permit shields are addressed in Rule 3004 (c). This facility has not applied for a permit shield.

Streamlining Requirements

Some emission units may be subject to multiple requirements which are closely related or redundant. The conditions may be streamlined to simplify the permit conditions and compliance. Emission limits, work practice standards, and monitoring, recordkeeping, and reporting requirements may be streamlined. Compliance with a streamlined condition will be deemed compliance with the underlying requirements whether or not the emission unit is actually in compliance with the specific underlying requirement. This facility has not applied for any streamlined conditions.

7. Summary of Emissions and Health Risks

Criteria Pollutant Emissions (tons/year) Annual Reported Emissions for Reporting Period 2010

<i>Pollutant</i>	<i>Emissions (tons/year)</i>
CO	0.22
NO _x	4.82
ROG	0.59
SO _x	3.09
TSP	0.82

Toxic Air Contaminants Emissions (TAC) Annual Reported Emissions for Reporting Period 2010

<i>TACs Reported</i>	<i>Emissions (lbs/yr)</i>	<i>TACs Reported</i>	<i>Emissions (lbs/yr)</i>
Ammonia	0.08	Perchloroethylene	0.752
Arsenic	4.67	PAHs, total	0.001
Benzene	67.7	Trichloroethylene	0.929
Cadmium	0.17	Vinyl chloride	8.417
Chromium (IV)	0.397		
Formaldehyde	0.047		
Lead (inorganic)	0.203		
Methylene chloride	25.98		
Nickel	0.33		

Health Risk from Toxic Air Contaminants

The facility is determined to be exempt from the Air Toxics Information and Assessment Act (AB2588). Final facility health risk was approved in 1998 with cancer risk = 0.29 in a million, Acute Hazard Index (HIA) = 0.01 and Chronic Hazard Index (CHA) = <0.1.

8. Compliance History

The facility has been subject to both self-reporting requirements and AQMD inspections. Facility inspection report for 7/15/2011 indicated that permitted equipment, operating during inspection, were operating satisfactorily and in compliance with permit conditions and applicable rules. As per District records there was one citizen complaint received (2/23/11) and there were no NC or NOV issued for the period 01/01/2010 through 12/20/2011.

9. Compliance Certification

By virtue of the Title V renewal permit application and issuance of the renewed permit in coming months, the reporting frequency for compliance certification for the facility shall be annual.

10. Comments

None.